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11 Attorneys for Defendant
12 FORD MOTOR COMPANY

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 DAX PIERSON) Case No.: C-06-06503 PJH
16 Plaintiff,)
17 vs.)
18 PATRICK SCOTT; ON THE MOVE, INC.;)
19 DIGBY ADLER GROUP, LLC; BANDAGO)
20 VAN RENTAL; AND DOES 1-50, inclusive)
21 Defendants,)
22 _____)
23 DIGBY ADLER GROUP, LLC., dba)
24 BANDAGO VAN RENTAL, and ON THE)
25 MOVE, INC.,)
26 Cross-Complainants,)
27 vs.)
28 FORD MOTOR COMPANY)
29 Cross-Defendant,)
30 _____)

JOINT MOTION TO AMEND CASE
MANAGEMENT AND PRETRIAL ORDER
CASE NO.C-06-06503 PJH

1 Plaintiff Dax Pierson ("Pierson") and Defendant Ford Motor Company ("Ford") have met
 2 and conferred with respect to expert discovery and respectfully move this Court to amend the
 3 January 18, 2007 Case Management and Pretrial Order as follows:

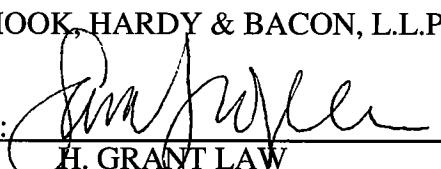
4 The parties will disclose experts and areas of testimony on June 15, 2007 per the Court's
 5 January 18, 2007 order. Depositions of Pierson's experts on each topic will precede Ford's experts
 6 on each topic. Ford's corresponding expert will be deposed a minimum of 60 days after Pierson's
 7 expert. Pierson's experts will have 30 days after each defense expert's deposition to serve a rebuttal
 8 report. If Ford needs to take an additional deposition based on Pierson's rebuttal reports, Pierson
 9 will make those experts available thereafter.

10 This agreed-to schedule will not permit expert and non-expert discovery to be completed by
 11 the current deadline of August 15, 2007. Instead, the parties anticipate completing expert and non-
 12 expert discovery by October 15, 2007.

13 Good cause exists to amend the Court's order to extend the discovery cutoffs to October 15,
 14 2007. The trial of this matter is set for February 11, 2008, nearly six months after the current August
 15, 2007 discovery cutoff. The parties have agreed to a schedule and procedure for expert discovery
 16 that will allow for an orderly exchange of each party's respective theories and opinions, while in no
 17 way impacting the February 11, 2008 trial date. Therefore, Pierson and Ford respectfully request that
 18 this Court amend the Case Management and Pretrial Order to extend the discovery cutoffs to
 19 October 15, 2007.

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 21 DATED: June 14, 2007
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SHOOK, HARDY & BACON, L.L.P.

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2 DATED: June 14, 2007

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7 IT IS SO ORDERED.

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9 DATED: 6/25/07

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11 THE DISPOSITIVE MOTIONS HEARING
12 DEADLINE WILL NOT BE
13 CONTINUED.

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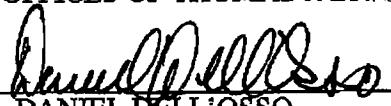
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LAW OFFICES OF THOMAS J. BRANDI

By: 

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Attorney for Plaintiff
Dax Pierson

